

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,**  
*Plaintiff,*

**v.**

**NEC CORPORATION,**  
*Defendant.*

§  
§ **CIVIL ACTION 6:20-cv-00923-ADA**  
§ **CIVIL ACTION 6:20-cv-00924-ADA**  
§ **CIVIL ACTION 6:20-cv-00925-ADA**  
§ **CIVIL ACTION 6:20-cv-00926-ADA**  
§ **CIVIL ACTION 6:20-cv-00927-ADA**  
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**PLAINTIFF'S MOTION TO SUBSTITUTE COUNSEL**

**TO THE HONORABLE JUDGE OF SAID COURT:**

Pursuant to the Federal Rules of Civil Procedure, Isaac P. Rabicoff with the law firm of Rabicoff Law LLC asks the Court to allow him to withdraw and to permit substitution of counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development.

**I.**

Isaac P. Rabicoff with the law firm of Rabicoff Law LLC asks the Court to allow him to withdraw as counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development and to allow attorneys Jonathan K. Waldrop, Darcy L. Jones, Marcus A. Barber, John W. Downing, Heather S. Kim, Jack Shaw, ThucMinh Nguyen and Paul G. Williams with the law firm of Kasowitz Benson Torres LLP, and Mark D. Siegmund with the law firm of Walt Fair, PLLC, to substitute as counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development. Substituted counsel's state bar numbers, office address, e-mail addresses, telephone number, and fax number are as follows:

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Darcy L. Jones (CA Bar No. 309474)  
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**II.**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development consents to and approves the withdrawal and substitution of counsel. The withdrawal and substitution will not delay these proceedings.

**III.**

WHEREFORE, PREMISES CONSIDERED, Isaac P. Rabicoff with the law firm of Rabicoff Law LLC asks the Court to grant this request for him to withdraw as counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development and allow Jonathan K. Waldrop, Darcy L. Jones, Marcus A. Barber, John W. Downing, Heather S. Kim, Jack Shaw, ThucMinh Nguyen and Paul G. Williams with the law firm of Kasowitz Benson Torres LLP, and Mark D. Siegmund with the law firm of Walt Fair, PLLC, to substitute as counsel for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development and that all future correspondence, whether by the Court or other counsel, be directed to said attorneys with Kasowitz Benson Torres LLP and to Walt Fair, PLLC, and for general relief in law and in equity.

Dated: December 31, 2020

By: /s/ Isaac P. Rabicoff  
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isaac@rabilaw.com  
Rabicoff Law LLC  
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Alexandria, VA 22315  
Telephone: (773) 669-4590

**Attorney for WSOU INVESTMENTS,  
LLC d/b/a BRAZOS LICENSING AND  
DEVELOPMENT**

**REPRESENTATION ACCEPTED:**

By: /s/ Jonathan K. Waldrop

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**CERTIFICATE OF CONFERENCE**

The undersigned attorney certifies that he has conferred with counsel for Defendant on the 31st day of December, 2020, and they have indicated that they do not oppose this motion and the substitution of counsel in this matter.

/s/ Isaac P. Rabicoff

Isaac P. Rabicoff

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE] — Document Filing System, to all counsel of record, on this 31st day of December, 2020.

/s/ Isaac P. Rabicoff

Isaac P. Rabicoff